

EXHIBIT F

Disclosure as to Expert Witness Special Agent Lennea Gordon

July 28, 2023

I. Statement of Opinions, Bases, and Reasons

The following is a complete statement of all opinions that the Government will elicit from Special Agent Lennea Gordon in its case-in-chief, along with the bases and reasons for them:¹

The Government expects to call Special Agent Lennea Gordon of the Bureau of Alcohol, Firearms, Tobacco, and Explosives (the “ATF”) to testify about the process by which firearms can be purchased—lawfully and otherwise—including but not limited to the mechanics of a firearms transaction, the administration of the ATF Form 4733, bookkeeping requirements for Federal Firearms Licensees (“FFLs”), and the concept of straw purchasing. In addition, SA Gordon will testify about the ATF firearms tracing process and the licensure of firearms dealers.

With respect to the process by which firearms can be legally obtained, SA Gordon is expected to testify about the mechanics of firearms transactions that occur inside FFLs, more commonly known as gun stores. Specifically, she will address the administration and purpose of the ATF 4733 (the “ATF Firearms Transaction Record”), approved methods of monetary exchange, and purchaser qualifications, including age and residency requirements. SA Gordon is expected to address the type of information contained on the Form 4473 as well as the purchaser’s obligation to provide truthful statements on the Form 433 and the FFL’s obligation to maintain the records of the transaction.

With respect to the process by which firearms can be obtained illegally, SA Gordon is expected to testify about the concept of “straw purchasing.” SA Gordon is expected to explain that straw purchasing occurs when an otherwise qualified individual—the straw purchaser—buys a firearm on behalf of another person, while purporting to be obtaining the firearm for himself. In addition to discussing the mechanics of straw purchasing, SA Gordon is expected to testify about some of the common reasons why individuals engage in straw purchasing, how straw purchasing enables people to take advantage of the patchwork of state gun laws, and how straw purchasers are typically identified by law enforcement.

SA Gordon is also expected to testify about the process by which the ATF licenses individuals to deal in firearms and the records that the ATF maintains to track the issuance of such licenses. SA Gordon is also expected to testify about the process by which the ATF traces firearms that have been recovered at crime scenes by constructing gun “life cycles,” using records of previous purchases based on the firearm serial numbers.

SA Gordon’s testimony will be based on her training, education, and experience, including her (1) five years of experience as an ATF Special Agent; (2) her five years of experience as a

¹ The defense has not yet provided notice of any testimony under Federal Rule of Criminal Procedure 16(b)(1)(C). To the extent such timely notice is provided, the Government will supplement this notice to include a statement of opinions it will elicit during its rebuttal to counter that testimony, as required by Federal Rule of Criminal Procedure 16(a)(1)(G).

Diplomatic Security Service Special Agent; (3) attendance at the ATF Special Agent Basic Training course; (4) attendance at the Criminal Investigator Training Program; and (5) her experience running the SDNY ATF Violent Crime Coordination Program.

II. Qualifications

SA Gordon's qualifications, including all publications authored in the previous ten years, are contained in her *curriculum vitae*, attached hereto.

III. List of Cases

SA Gordon has not testified as an expert at trial or by deposition in the past four years.

 07-28-2023
Leneea Gordon, Special Agent
ATF